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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF THOMAS B. RUPP IN
SUPPORT OF REPLY IN SUPPORT OF
REORGANIZED DEBTORS' SEVENTY-
SIXTH OMNIBUS OBJECTION TO CLAIMS**

[Related to Docket No. 10537]

Date: October 19, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 I, Thomas B. Rupp, pursuant to section 1746 of title 28 of the United States Code, hereby declare
2 under penalty of perjury that the following is true and correct to the best of my knowledge, information,
3 and belief:

4 1. I am an attorney with Keller Benvenuti Kim LLP, co-counsel to the Reorganized Debtors
5 in the above-captioned Chapter 11 Cases. I am licensed to practice law in the State of California and
6 admitted to practice before the United States District Court for the Northern District of California. I
7 submit this Declaration in support of the *Reply in Support of Reorganized Debtors' Seventy-Sixth*
8 *Omnibus Objection to Claims* (the "**Reply**"), filed contemporaneously herewith, and in further support
9 of the *Reorganized Debtors' Seventy-Sixth Omnibus Objection to Claims (No Liability / Passthrough*
10 *Claims)* [Docket No. 10537] (the "**Omnibus Objection**").¹

11 2. If called upon to testify, I would testify competently to the facts set forth in this
12 Declaration. I am authorized to submit this declaration on behalf of the Reorganized Debtors.

13 3. Attached hereto as **Exhibit A** is a screenshot taken by me on October 11, 2021 of a
14 discussion thread on Quora, located at [https://www.quora.com/What-size-concrete-slab-can-hold-90-](https://www.quora.com/What-size-concrete-slab-can-hold-90-000-lbs)
15 [000-lbs](https://www.quora.com/What-size-concrete-slab-can-hold-90-000-lbs). Certain marked posts in the thread on pages 3 and 4 of the exhibit include language nearly
16 identical to portions of the Alleged Report included by the Greens in their First Response.

17 4. Attached hereto as **Exhibit B** is the cover page and first page of a paper titled Soil and
18 Structure Vibrations from Construction and Industrial Sources, retrieved by me on October 11, 2021
19 from <https://scholarsmine.mst.edu/cgi/viewcontent.cgi?article=2969&context=icchge>. The highlighted
20 section on the first page of the document includes language nearly identical to portions of the Alleged
21 Report included by the Greens in their First Response.

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28 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in
the Omnibus Objection or the Reply, as applicable.

1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
2 correct to the best of my knowledge, information, and belief. Executed this 12th day of October, 2021.

3 /s/ Thomas B. Rupp

4 Thomas B. Rupp